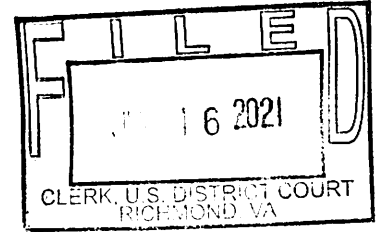


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION



ADESIJUOLA OGUNJOBI,

PLAINTIFF,

V.

CIVIL ACTION NO. 3:21cv392

RALP NORTHAM, in his official capacity)
as the Governor of Commonwealth of)
Virginia,)
MARK HERRING, in his official capacity)
as the Attorney General of Commonwealth)
of Virginia,)
RONALD SCHMITZ, in his official capacity)
as the Chief Investment Officer of Virginia)
Retirement System Investment Portfolio,)
O'KELLY E. MCWILLIAMS, III, in his)
official capacity as Chair of Board of)
Trustees Virginia Retirement System,)
JOSEPH W. MONTGOMERY, in his)
official capacity as Vice Chair of Board of)
Trustees Virginia Retirement System,)
J. BRANDON BELL, II, in his official)
capacity as member of Board of Trustees)
Virginia Retirement System,)
JOHN M. BENNETT, in his official capacity)
As member of Board of Trustees Virginia)
Retirement System,)
MICHAEL P. DASHAROON, in his official)
capacity as member of Board of Trustees)
Virginia Retirement System,)
WILLIAM A. GARRETT, in his official)
capacity as member of Board of Trustees)
Virginia Retirement System,)
Susan T. Gooden, in her official capacity as)
member of Board of Trustees Virginia)
Retirement System,)

W. BRETT HAYES, in his official capacity)
as member of Board of Trustees Virginia)
Retirement System,)
TROILEN GAINEY SEWARD, in her)
official capacity as member of Board of)
Trustees Virginia Retirement System,)

DEFENDANTS.

COMPLAINT—RACIAL DISCRIMINATION

Plaintiff Adesijuola Ogunjobi (“Ade”) files this Complaint against Defendants Governor Ralph Northam, Attorney General Mark Herring, Chief Investment Officer Ronald Schmitz, O’Kelly E. McWilliams, III, J. Brandon Bell, Joseph W. Montgomery, John M. Bennett, II, Michael P. Dasharoon, William A. Garrett, Susan T. Gooden, Ph.D., W. Brett Hayes and Troilen Gainey Seward (Governor Ralph Northam, et al) and states as follows:

NATURE OF THE ACTION

1. This action and lawsuit arises from pure and classic racism, discrimination, bigotry and failure or total disregard for the rule law to disburse the litigation funding of \$250,000,000 loan with repayment plan structured under Virginia Retirement System Investment Portfolio Litigation Funding on May 10, 2021 and all parties served such document which was filed under seal with this Court regarding COVID-19 Class Action challenge and memorandum to disburse fund filed on June 1, 2021 with June 7, 2021 to June 11, 2021 set for the funds to be disbursed accordingly.

2. Ade, like all peoples across the globe was introduced to COVID-19, however his instinct kicked in this is a scam after a while this virus or so-called disease about to annihilate the

universe and every creature is about to die which if that's the case, there's nothing anyone could do to stop it because the universe is a universe of "mortality," not "immortality." Class action lawsuit was filed to address COVID-19 veracity. Hard work is an understatement. The more research, the more COVID-19 appears to be a total scam. There's no such virus where all humans exposed to it will develop some form of disease. As of today, COVID-19 has no known disease that supports such disease even ever exists. If all humans are susceptible to all diseases, every creature on this planet will be walking around with all the documented and verified diseases on the face of the earth. However, that's not the case and COVID-19 to be promoted as the only virus where all humans are susceptible to it is a global "scam" and total fraud.

3. It takes money to do anything in this civilized society. Ade submitted the document to secure \$250,000,000 short-term loan plus incentives of multibillion future registered securities granted at no cost to Virginia Retirement System Investment Portfolio. The lack of response, ironically validates the loan will never be in default. If the litigation funding loan has potential to go into default, Attorney General Mark Herring via his attorneys would have filed documents or opinion with this Court that the \$250 million loan will go into default and there's no way the pension fund should be subjected to such high risk investment proposal.

4. Ade formed several entities in State of Virginia that when they're fully in operation, the entities will be enormous. The securities that will be registered for future issue by a Transfer Agency¹ will be U.S. registered securities. The Transfer Agency is actually registered in State of Virginia. The pension fund is in State of Virginia. The office of the Attorney General of Commonwealth to assist with counsels and prosecution of COVID-19 challenge is in State of

¹ Transfer Agency issues registered securities on behalf of issuers to investors and shareholders and individuals, not the company itself.

Virginia. The University of Virginia School of Law is in State of Virginia. The account provided to Ronald Schmitrz, the Chief Investment Officer of Virginia Retirement System Investment Portfolio and others to make such disbursement is with SunTrust, the United States based financial institution with branches in State of Virginia. There's no foreign affiliation tied to the account and everything is "local." Two lecturers at University of Virginia School of Law were contacted due to the lecturers as also attorneys with license to practice law in State of Virginia. They still refused to make necessary arrangement to disburse.

5. The only reason why all the above parties ignored this is because Ade is a black man, period. Peoples can't stand black people dating back to era where blacks were kidnapped, incarcerated like common criminals and used them as slaves after auction. It is difficult even in 21st Century for any individual not to harbor some deep hatred of a black person. In the United States alone, blacks were denied education, housing, jobs, and they went to court to demonstrate such treatment as "egregious." Today, an Attorney General of Commonwealth of Virginia is exhibiting "deep" hatred of man he knows nothing about who has no criminal record because he conducted himself that way throughout his life and as usual, they all think the whole planet would collapse because a black man has talent for vision and making investment like they normally do with other investments would send the whole planet into tailspin. Blacks with tremendous gift to play sports were denied access to sports until integration allowed them to play and the first black athletes saw "hell" as in insults like N-words, name calling as in "apes", "monkeys," bananas throwing into the field which is still happening today, even when they played regardless if they're winning for the team they played for. Just like Virginia Retirement System Investment Portfolio has never encountered such enormous investment returns, jobs creation, no fees paid out to attorneys, money managers to bring them such unique investment,

they're still angry and harbor enormous animosity. If the Attorney General Mark Herring has its way, he would issue arrest warrant for Ade or contact FBI and U.S. Marshalls in Florida to extradite for prosecution. It is deep how people hate black people. It is not an exaggeration.

6. Attorney General Mark Herring never filed any document with the Court to demonstrate COVID-19 Class Action which Commonwealth of Virginia is now party is bogus by showing this Court all the elements of evidence to support the veracity of COVID-19. Attorney General Mark Herring never filed any document under any statutes that the naming of Commonwealth of Virginia as co-plaintiff when amended complaint was filed and motion designating Attorney General of Commonwealth and Special (Outside) Counsel is illegal. Nor the Attorney General advised this Court that there's a conflict-of-interest to assist in prosecution of COVID-19 Class Action challenge. There's no such conflict-of-interest and the Attorney General of Commonwealth has no legal authority to defend COVID-19 because the office is not the official legal counsel for World Health Organization aka WHO. WHO named the bogus virus "Coronavirus" or "COVID-19" which means the only party to defend COVID-19 is WHO officials via counsels they will retain to do so in court and Toks Banc Corp will pay for such legal costs for both litigants..

7. On June 7, 2021, emails were sent to Governor, Attorney General's offices (several attorneys' emails), Chief Investment Officer of Virginia Retirement System Investment Portfolio and Board of Trustees instructing them to disburse \$12,000,000 into Attorney General's account, \$2,000,000 into University of Virginia School of Law's account due to agenda calls for University of Virginia School of Law to recruit some law school students and all recruiters will be paid, this is not a volunteer work. Also several officials at University of Virginia School of Law received the same email about disbursement instruction. The parties

were warned that failure to make disbursement by June 11, 2021, a lawsuit will be filed with Summary Judgment to get the funds disbursed.

PARTIES

8. Adesijuola Ogunjobi is an entrepreneur, with natural and raw talent as a writer. He formed several entities in State of Virginia that will make tremendous impact in State of Virginia and one of the entities will engage in Securities Exchange operation to trade securities from all over the world will occur in Virginia. He filed the COVID-19 Class Action challenge as a “foundation” where attorneys will take over due to concerns the direction COVID-19 scam is taking society. He never envisioned that COVID-19 is now a global fraud and scam because the evidence now is overwhelming.

9. Defendant Governor Ralph Northam is a duly sworn Governor of Commonwealth of Virginia whose term will end in January 2022.

10. Defendant Attorney General Mark Herring is the Attorney General of Commonwealth of Virginia whose term will end in January 2022 if not re-elected.

11. Defendant Chief Investment Officer Ronald Schmitz is currently Chief Investment Officer of Virginia Retirement System Investment Portfolio.

12. Defendant O’Kelly McWilliams, III² is Chair and a member Board of Trustees of Virginia Retirement System.

² O’Kelly McWilliams III is an attorney at the law firm Mintz. When Ade first contacted Virginia Retirement System for investment, he recommended Mintz Law firm to act as Counsel for the plaintiffs of Class Action filed with District Court Eastern District of Virginia. No response.

13. Defendant Joseph Montgomery is Vice Chair and a member Board of Trustees of Virginia Retirement System.

14. Defendant J. Brandon Bell is a member Board of Trustees of Virginia Retirement System.

15. Defendant John Bennett, II is a member Board of Trustees of Virginia Retirement System.

16. Defendant Michael Disharoon is a member Board of Trustees of Virginia Retirement System.

17. Defendant William Garrett is a member Board of Trustees of Virginia Retirement System.

18. Defendant Susan Gooden is a member Board of Trustees of Virginia Retirement System.

19. Defendant W. Brett Hayes is a member Board of Trustees of Virginia Retirement System.

20. Defendant Troilen Gainey Seward is a member Board of Trustees of Virginia Retirement System.

21. Due to a Pro Se cannot represent other unnamed parties, however this is outlined for the purpose of other unnamed parties (co-plaintiffs) that suffer injury as well: a) Commonwealth of Virginia, the 10th State of the United States which will benefit from jobs creation due to more entities will be formed in State of Virginia and part owner of huge assets to be gained from the litigation funding and including millions the state might spent on purchase of

bogus COVID-19 vaccines³ for its residents, throw in unemployment benefits which has experienced backlog; b) Virginia Retirement System Investment Portfolio whose investments criteria covers United States and across the globe supporting economies via investments, however to be denied this unprecedented investment returns due to assets via registered securities (stock); c) Taxpayers of Commonwealth of Virginia that own 66% of Virginia Retirement System Investment Portfolio; d) Contributors of the pension fund Virginia Retirement System; e) Toks Banc Corp et al starting with Toks Banc Corp, the Bank Holding Company with business plan to conduct acquisition of few bank holding companies in cash that will make Toks Banc Corp duly formed in State of Virginia the largest Bank Holding Company in the world with access to credit facility with the Federal Reserve Bank/System that can repay the loan under litigation funding or one of the plaintiffs as in OPEC can even refinanced the loan as well to pay off Virginia Retirement System Investment Portfolio.

JURISDICTION AND VENUE

22. This Court has subject matter jurisdiction over this suit pursuant to 28 U.S.C. § 1332(a) as there exists complete diversity of citizenship between the Plaintiff and Defendants and the amount in controversy exceeds \$75,000.00, non-exclusive of interest and costs.

23. Plaintiff bring this civil rights lawsuit pursuant to 42 U.S.C. § 1983, for the violation of rights secured by the First Amendment to the United States Constitution, as applied to the states by the Fourteenth Amendment.

³ Currently United States government is footing the bill to purchase the bogus COVID-19 vaccines, however that will not last forever because the obligation will soon shift to states due to COVID-19 scammers will not end their scam within few years, this scam is in perpetuity.

24. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 (federal question), 1343 (civil rights), and 2201-2202 (Declaratory Judgment Act).

25. This Court has personal jurisdiction over the Defendants pursuant to Va. Code 8.01-328.1 et seq.

26. Venue is proper under 28 U.S.C. § 1391(b), on the ground that all or a substantial part of the acts giving rise to Plaintiff's claims occur in the Eastern District of Virginia, and on the ground that some or all of the Defendants reside in the Eastern District of Virginia.

FACTUAL ALLEGATIONS

Plaintiff was Racially Profiled

27. The Constitution of the United States was born of the proposition that all legitimate governments must secure the right of every person to Life, Liberty, and the Pursuit of Happiness. Repression is an understatement. The audacity of Mark Herring declining to file any form of documents with the Court after documents were served via mail and email, respectively regarding the designation and securing funds validates how people perceive a black person⁴ in our society. When we allow people to undermine rights to innovation or entrepreneurial spirits, what we're saying is "freedom is meaningless" because when one's right to utter one's thought and ideas has ceased to exist, then life is meaningless. The only reason why Mark Herring

⁴ The perception of blacks is getting worse. Now it is "over my dead body" to make money for others. A black person must be shot dead by a white police officer before big time attorneys can scream civil rights violation and walk away with millions. If you're a black man that wants to make money for others while alive, forget it, they will remind you "over my dead body" whole new meaning to that phrase. Examples of dead blacks that raked in millions for others: George Floyd--\$27 million; Breonna Taylor--\$12 million; Laquan McDonald--\$16 million; Freddie Gray---\$6.4 million; Philando Castile--\$3 million; Tamir Rice---\$6 million; Akai Gurley---\$4.1 million; Michael Brown---\$1.5 million; Eric Garner---\$6 million. Amazing how George Floyd led the pack, while alive he was passing counterfeit money, and "over my dead body" made \$27 million for family and attorneys.

ignored this is because Ade is a black man. The litigation funding document filed under seal with the Court is to demonstrate proper documentation was prepared and rule of law followed.

28. Ronald Schmitz, the Chief Investment Officer of Virginia Retirement System Investment Portfolio never even sent an email to acknowledge receipt of documents sent via email nor did he make any effort to discuss this with the Board of Trustees of Virginia Retirement System because his attitude is ... this is not my money, I don't care what the pension fund gets out of this.... However, such attitude never emerged when it comes to other investments the CIO review for the pension fund sustaining this is about the color of the skin, nothing to do with merit.

Assets To Support Loan Ignored

29. Everybody raises money. Everybody is entitled to gain access to money. The defendants are all making a living getting paid salaries via the state or the pension fund. Mark Herring raised \$1.1 million to seek reelection as AG of Virginia. Virginia Retirement System Investment Portfolio invests in securities and other forms of instruments via money managers to support economies across the globe in return for nice investment returns. Ade established conducting global press releases to seek 100,000,000 donors across the globe to donate \$20 per donor which will be \$2,000,000,000 more than enough to pay \$250,000,000 borrowed. Preferred Shares of Toks Banc Corp is another potential. Credit facility of Toks Banc Corp which is designed to acquire major bank holding companies in cash and use the same credit facility to pay the \$250,000,000 is another asset. Bond offering is another assets because "debt" is actually an "asset" both the issuer and buyer can use as their assets. Lenders or investor use "assets" to lend. Tangible assets are physical like cash on hand, real estate, vehicles, etc. Intangible assets are accounts receivables, patents, trademarks, intellectual property, etc. The Defendants can use the

intangible assets of Toks Banc Corp who is the Lead Plaintiff because as a Bank Holding Company, the potential is extraordinary to secure additional funds to pay off the \$250,000,000 loan.

30. Virginia Retirement System has: a) \$32.1 billion in public equity; b) \$11.9 billion in credit strategies⁵; c) \$12.9 billion in fixed income; d) \$11.1 billion in real assets; e) \$9.5 billion in private equity; f) \$1.1 billion in private investment partnerships; and g) \$2.2 billion in public strategies portfolio. This validates the \$250,000,000 loan is a drop in the bucket compared to enormous assets controlled by the pension fund and the additional assets that will be added from the litigation funding transaction. This is all about discrimination, nothing to do with a pension afraid to lose money that can affect the pension fund.

Investment Returns in Litigation Funding Supports the Racism/Discrimination

31. Virginia Retirement System Investment Portfolio as outlined above boasts billions in assets via investments, but this one investment under litigation funding proposed to the pension fund dwarfed the above assets of VRSIP, period. No contest. This Court has such information via the litigation funding document as exhibit. The Defendants have such information. That could explain the racism because a black man put this together for this pension fund is unacceptable. If Ade is not a black man, Ronald Schmitz would have contacted him after the litigation funding document was filed under seal with the Court and served to all parties involved.

⁵ Credit Strategies are Municipal Bonds issued by state, city and local. However such financial debt securities/instruments are tied to water, sewage, property taxes, etc., normally derived from average individuals which is ironic how these so-called big money managers invest in bonds that will pay interest via revenues generated from average people or residents. Example is City of Detroit's Chapter 9 Bankruptcy with \$18 Billion in outstanding debts due to Detroit has higher unemployment rates meaning people can't pay rents, mortgages, homes abandoned thus leading to unpaid utilities. If people have no jobs, pension funds can't make money.

Plaintiff has Demonstrated his Sophistication, Savvy

32. One must be very sophisticated and savvy to put all this together which is what investors like Virginia Retirement System Investment Portfolio look for. However, the racism rear its “ugly head” into it as usual, not uncommon. Defendants are acting as if what they received is nonsense, nothing could be further from the truth. That’s classic racism to demean one’s work (if such party is black), remain silent and act as if they want GOD to come down for the money. GOD is not going to come down for no one. Any money spent will be spent on humans on this planet, no one will take it upstairs to spend it including people that go into space via commercial space flight that can cost millions per “customer” which such price will go down in the future if the commercial space flight gains momentum. The “customer” spends the money down here (planet earth)⁶ and they go into the orbit in spacecraft like a typical travel by air.

Complaint and Litigation Funding Document never the Issue

33. The Complaint as in COVID-19 Class Action challenge is never an issue with the Defendants because if such is the case, Mark Herring would have addressed it. Litigation Funding is never the issue as well. Ade learned this via one law firm that stated to paraphrase we don’t want to represent you. Bingo!!! The law firm has no issue with the complaint as in COVID-19 Class Action challenge, but the man behind it, a black man is the issue. Attorneys filed ridiculous complaints every day in courts across United States. However, some law firms never state we don’t want to represent you, they declined due to full roster of clients or lack of expertise. Again, Mark Herring never presented any factors before the Court.

⁶ Tom Cruise and NASA via Elon Musk just announced the first movie to be shot in space, well where is the money coming from? Or are they spending money in the space to shoot? Defendants are delusional to think a black man putting together a transaction is a “freak.”

COUNT ONE- RACISM

34. Plaintiff incorporates and re-alleges each and every allegations contained in the preceding paragraphs of this Complaint.

35. Ade is an entrepreneur and a black man and has no intention to be afraid of his vision or right to submit proposal to any institution in the business of engaging in investments. The silence from defendants is classic “racism.” The defendants invest the pension fund’s money (not theirs) across the globe, but they resent a “local” investment that supports “charity begins at home” due to the party is black when all along people will benefit from this, which reinforces how people can’t stand a black person, be down on your luck, dead and buried, they will cry, lit a candle, visit your family, hug. Just display audacity, guts, leadership, you’re the worst human being on the face of the earth. That’s what defendants are engaging in. Ade will never, never, never be afraid to think. Anybody who doesn’t like it, that’s right, but the rule of law is clear, racism and discrimination are limited.

36. Virginia Retirement System is an entity, not an individual which means the pension fund did not discriminate, the individuals named as defendants engaged in discrimination. Virginia Retire System will not go broke overnight because \$250,000,000 loan was approved with potential to be paid off in 90 days. The color of the man behind it is what they resent. They know it if the words get out, billions across the globe will support the right to know if this virus is real or not. But a black man pushing for it is too much for them in Virginia to embrace.

37. Governor Ralph Northam never conducted any press releases about this, but hoping the whole topic will die down quietly to protect the delusions of COVID-19 scammers at

all cost because it is virtually impossible for people to respect a black person, the bogus diversity people promote is just that BOGUS. Behind closed doors they can't stand diversity which ironically no one has any choice because the creator of this universe introduced diversity.

38. Mark Herring, who loves to fly off the handle when fraud is committed by any party or scream his head off when racism is detected for example he asked Ralph Northam to resign due to "Black Face" was associated with Ralph Northam in the past. Today, it looks like Mark Herring is the one wearing a "Black Face" lending credence to his hypocrisy and typical of people using black people to promote their superficial respect for blacks. He refused to file any form of documents because the man is a black man.

39. Ronald Schmitz refused to conduct any form of communication with Ade based on racism. He received all the documents served and he never acknowledged it as if he invests in angels in heaven, not humans with flesh and blood. Racist to the core.

40. The Board of Trustees of Virginia Retirement System don't care if the pension fund lost money or made money as long as they got paid. It is called "white store syndrome" where a white store owner is quick to ask a black customer to leave the store due to money made from white customers enough to get by, they can afford to turn down a black customer based on hate and color of the skin. Just like the defendants felt that they invest and make money for the pension fund, a black man making money for the pension fund is not acceptable.

41. The Defendants don't have any authority not to invest, they will be terminated, period. They must invest and evaluate the best investment opportunity for the fund, period.

42. The Defendants are subtly stating Ade has no right to seek Counsels to assume legal representation which is bizarre. Right to counsel is legal because civilized society demands

such legal representation. Litigation Funding is all about securing funds to cover legal costs including paying attorneys' fees.

COUNT TWO - HUMAN RIGHTS VIOLATION

42. Plaintiff reincorporates and re-alleges each and every allegations contained in the preceding paragraphs of this Complaint.

43. Defendants are trying to defend COVID-19 scammers because the litigation funding will be used partially to start the whole process to finally get to the bottom of COVID-19 if it is real or not. However Defendants don't have any legal authority to defend COVID-19 scammers. By total disregard of the pending request to disburse fund is in violation of freedom of the speech, human rights violation, racism that whatever anyone says or questions this nonsense and scam called COVID-19, we will fight it just like people fought abolition of slavery, end to segregation, apartheid, and all the ugliness of human nature.

44. Virginia Human Rights Act § 2.2-3900 (A) (B)(1)(2)(3)(4)(5) supports the litigation funding investment proposed to Virginia Retirement System Investment Portfolio under the litigation funding and also bars Virginia Retirement System Investment Portfolio to discriminate against the taxpayers of Virginia that own 66% of the pension fund or the individual that submits the litigation funding document for closing.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Adesijuola Ogunjobi demands judgment against Defendants, jointly and severally, as follows:

A. Order Defendants to disburse \$250,000,000 starting with \$12,000,000 must

be disbursed to Attorney General of Commonwealth of Virginia as outlined via email sent to the Defendants on June 7, 2021.

- B. Order Defendants to disburse \$2,000,000 into the account of University of Virginia School of Law.
- C. Order the renaming \$236,000,000 deposited into Aurelia & Stephen LLC's account.
- D. Order all \$250,000,000 disbursed into Aurelia & Stephen LLC 's account if both Attorney General's office and University of Virginia School of Law declined because there are other attorneys awaiting Proof of Funds in order to file Appearance of Counsel form with the Court.
- E. Grant such other relief that this Court deems just and proper.

June 14, 2021

Respectfully submitted,

/s/Adesijuola Ogunjobi

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